

KEVIN G. HORBATIUK (KG-4977)
RUSSO, KEANE & TONER, LLP
Attorneys for Defendant
CUNNINGHAM DUCT WORK s/h/i/a
CUNNINGHAM DUCT CLEANING CO., INC.
26 Broadway - 28th Floor
New York, New York 10004
(212) 482-0001

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
**IN RE COMBINED WORLD TRADE CENTER
AND LOWER MANHATTAN DISASTER SITE
LITIGATION**
-----X

21 MC 102 (AKH)

**SALVADOR MEDRANO and TRINIDAD
MEDRANO,**

Plaintiffs,

**DOCKET NO:
07 CV 4492**

-against-

**100 CHURCH, LLC, 55 WATER STREET
CONDOMINIUM, AMBIENT GROUP, INC.,
AMERICAN EXPRESS BANK, LTD., AMERICAN
EXPRESS COMPANY, AMERICAN EXPRESS
TRAVEL RELATED SERVICES COMPANY, INC.,
BATTERY PARK CITY AUTHORITY, BFP TOWER
C CO., LLC., BFP TOWER C MM LLC.,
BLACKMON-MOORING STEAMATIC CATASTOPHE,
INC., d/b/a BMS CAT, BROOKFIELD FINANCIAL
PROPERTIES, INC., BROOKFIELD FINANCIAL
PROPERTIES, L.P., BROOKFIELD PROPERTIES
CORPORATION, BROOKFIELD PROPERTIES
HOLDINGS, INC., CUNNINGHAM DUCT CLEANING
CO., INC., GPS ENVIRONMENTAL CONSULTANTS, INC.,
INDOOR AIR PROFESSIONALS, INC.,
INDOOR ENVIRONMENTAL TECHNOLOGY, INC.,
LAW ENGINEERING, P.C., LEHMAN
BROTHERS, INC., LEHMAN COMMERCIAL
PAPER, INC., MCCLIER CORPORATION,
MERRILL LYNCH & CO., INC., NEW WATER
STREET CORP., ONE WALL STREET HOLDINGS,
LLC., ROYAL AND SUNALLIANCE INSURANCE**

**NOTICE OF
ADOPTION OF
ANSWER TO
MASTER COMPLAINT**

**GROUP, PLC., THE BANK OF NEW YORK
COMPANY, INC., TRAMMELL CROW
COMPANY, TRAMMELL CROW
COMPANY, TRAMELLE CROW CORPORATE
SERVICES, INC., TRC ENGINEERS, INC.,
TUCKER ANTHONY, INC., WFP RETAIL CO.,
G.P., CORP., WFP RETAIL CO., L.P., WFP
TOWER A CO., WFP TOWE A CO., G.P.,
CORP., WFP TOWER A CO., L.P., and ZAR
REALTY MANAGEMENT CORP.,**

Defendants.

-----X

PLEASE TAKE NOTICE, that defendant CUNNINGHAM DUCT WORK s/h/i/a CUNNINGHAM DUCT CLEANING CO., INC. ("CUNNINGHAM"), by its attorneys, RUSSO, KEANE & TONER, LLP, as and for its Response to the allegations set forth in the Complaint by Adoption (Check-Off-Complaint) Related to the Master Complaint filed in the above referenced action, hereby adopt their Answer to Master Complaint dated, August 1, 2007, which was filed in the matter of *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102(AKH).

WHEREFORE, the defendant, CUNNINGHAM demands judgment dismissing the above captioned caption action as against it, together with its costs and disbursements and for such other and further relief as this Court deems just and proper.

Dated: New York, New York
January 11, 2008

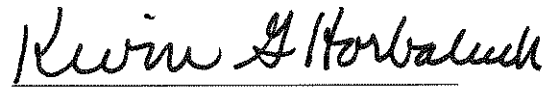
Kevin G. Horbatiuk
Kevin G. Horbatiuk (KGH4977)
Attorneys for Defendant
**CUNNINGHAM DUCT WORK s/h/i/a
CUNNINGHAM DUCT CLEANING CO.,
INC.**
RUSSO, KEANE & TONER, LLP
26 Broadway-28th Floor
New York, New York 10004
(212) 482-0001
RKT File No. 824.078

TO: CHRISTOPHER R. LaPOLA, ESQ.,
WORBY GRONER EDELMAN & NAPOLI BERN, LLP
Attorney for Plaintiffs
SALVADOR MEDRANO and TRINIDAD MEDRANO
115 Broadway - 12th Floor
New York, New York 10006
(212) 267-3700

CERTIFICATION OF SERVICE

I hereby certify that a copy of the above and foregoing has been served upon the following listed person by placing a copy of the same in the United States mail, postage prepared and properly addressed, this the 11th day of January, 2008.

CHRISTOPHER R. LaPOLA, ESQ.,
WORBY GRONER EDELMAN & NAPOLI BERN, LLP
Attorney for Plaintiffs
SALVADOR MEDRANO and TRINIDAD MEDRANO
115 Broadway 12th Floor
New York, New York 10006

A handwritten signature in black ink, reading "Kevin G. Horbatiuk", written over a horizontal line.

KEVIN G. HORBATIUK